Mr. William Koenemann
Colwell/General, Inc.
P.O. Box 218
Kendallville, IN 46755

Re: **113-14440-00019**
Third Administrative Amendment to
Part 70 113-6020-00019

Dear Mr. Koenemann:

Colwell/General, Inc. was issued a permit on October 6, 1998 for a paint chip and stripe card manufacturing operation. A letter requesting a significant source modification was received on January 11, 2001. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

The maximum throughputs of lines S-1, S-2, and S-3 are changed from individual levels of 35 gallons of coatings per hour, 432 pounds of coating per hour, and 35 gallons of coatings per hour, respectively, to a combined maximum throughput of 118 gallons of coating per hour.

The following changes are made to the Title V permit to incorporate the changes into the permit. The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in **bold**):

Condition A.1 is amended to reflect the source as an existing minor source for the purposes of PSD, as determined in the source modification review.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary paper coating and offset printing presses operation producing paint chips and stripe cards.

Responsible Official:	David Brayton
Source Address:	231 South Progress Drive East, Kendallville, Indiana 46755-3269
Mailing Address:	P.O. Box 218, Kendallville, Indiana 46755-0218
Phone Number:	219-347-1981
SIC Code:	2752
County Location:	Noble
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program ~~Major~~ **Minor** Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

Condition A.2 is amended to include lines S1, S2, and S3 as one operation with a maximum combined throughput of 118 gal/hr.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

1. one (1) paper coating **operation, including** line**s**~~,~~ S-1, ~~with a maximum throughput of 35 gallons of coatings per hour. Emissions shall be controlled by direct flame incinerator, TO-1, (capacity details listed under insignificant activity (1)), then exhausted at Stack/Vent ID #S1;~~

2. ~~one (1) paper coating line,~~ S-3, **and** ~~with a maximum throughput of 35 gallons of coatings per hour. Emissions shall be controlled by a thermal oxidizer, TO-1, then exhausted at Stack/Vent ID #S1;~~

3. ~~one (1) paper coating line,~~ S-2, with a **combined** maximum throughput of ~~432 pounds~~ **118 gallons** of coating per hour~~.~~ **, with** ~~E~~**emissions** ~~shall be~~ controlled by ~~a~~ thermal oxidizer~~,~~ TO-1 (capacity details listed under insignificant activity (1)), **and emissions** ~~then~~ exhausted at Stack/Vent ID #S1;

~~4.~~**2.** one (1) enclosed can washer with recirculating solvent, with suspended VOC exhausted to and controlled by a thermal oxidizer, TO-1, then exhausted at Stack/Vent ID #S1;

~~5.~~**3.** one (1) curing oven and rollcoating paper coating application system, identified as CC-1, equipped with one (1) 1.35 million (MM) British thermal units (Btu) per hour, natural gas-fired burner for the curing oven, with a maximum throughput of 36 pounds of coating per hour to coat a maximum of 41.8 pounds of paper per hour, with VOC emissions controlled by an existing thermal oxidizer, identified as TO-1, exhausting through one (1) stack, identified as #S1;

~~6.~~**4.** one (1) curing oven and rollcoating paper coating application system, identified as S-4, with a maximum throughput of 425 pounds of coating per hour to coat a maximum of 1,079 pounds of paper per hour, with VOC emissions controlled by a new thermal oxidizer, identified as TO-2, exhausting through one (1) stack, identified as #TO-2; and

~~7.~~**5.** one (1) thermal oxidizer, identified as TO-2, using natural gas as a supplementary fuel at a maximum heat input rate of 3.0 million (MM) British thermal units (Btu) per hour, exhausting through one (1) stack, identified as #TO-2. The curing oven on the S-4 coating line is powered through heat recovery from this thermal oxidizer.

The facility description of Section D.1 shall be amended to include lines S1, S2, and S3 as one operation with a maximum combined throughput of 118 gal/hr.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(1) one (1) paper coating **operation, including** line**s**~~,~~ S-1, ~~with a maximum throughput of 35 gallons of coatings per hour. Emissions shall be controlled by direct flame incinerator, TO-1, (capacity details listed under insignificant activity (1)), then exhausted at Stack/Vent ID #S1;~~

~~(2) one (1) paper coating line,~~ S-3, **and** ~~with a maximum throughput of 35 gallons of coatings per hour. Emissions shall be controlled by a thermal oxidizer, TO-1, then exhausted at Stack/Vent ID #S1;~~

~~(3) one (1) paper coating line,~~ S-2, with a **combined** maximum throughput of ~~432 pounds~~ **118 gallons** of coating per hour~~.~~ **, with Eemissions** ~~shall be~~ controlled by ~~a~~ thermal oxidizer~~,~~ TO-1 (capacity details listed under insignificant activity (1)), **and emissions** ~~then exhausted at Stack/Vent ID #S1;~~

(2)~~(4)~~ one (1) enclosed can washer with recirculating solvent, with suspended VOC exhausted to and controlled by a thermal oxidizer, TO-1, then exhausted at Stack/Vent ID #S1; and

(3)~~(5)~~ one (1) curing oven and rollcoating paper coating application system, identified as CC-1, equipped with one (1) 1.35 million (MM) British thermal units (Btu) per hour, natural gas-fired burner for the curing oven, with a maximum throughput of 36 pounds of coating per hour to coat a maximum of 41.8 pounds of paper per hour, with VOC emissions controlled by an existing thermal oxidizer, identified as TO-1, exhausting through one (1) stack, identified as #S1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Fulton, at (800) 451-6027, press 0 and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
SDF
cc: File - Noble County
Noble County Health Department
Northern Regional Office
Air Compliance Section Inspector- Doyle Houser
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Colwell/General, Inc.
231 South Progress Drive E
Kendallville, Indiana 46755-3269

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit: T113-6020-00019	Issued: October 6, 1998
First Administrative Amendment: 113-10300-00019	Issued: February 15, 1999
Second Administrative Amendment: 113-11506-00019	Issued: December 28, 1999
First Significant Permit Modification: 113-11777-00019	Issued: May 23, 2000
Third Administrative Amendment: 113-14440-00019	Affected Pages: 4, 4a, and 26
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary paper coating and offset printing presses operation producing paint chips and stripe cards.

Responsible Official:	David Brayton
Source Address:	231 South Progress Drive East, Kendallville, Indiana 46755-3269
Mailing Address:	P.O. Box 218, Kendallville, Indiana 46755-0218
Phone Number:	219-347-1981
SIC Code:	2752
County Location:	Noble
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

1. one (1) paper coating operation, including lines S-1, S-3, and S-2, with a combined maximum throughput of 118 gallons of coating per hour, with emissions controlled by thermal oxidizer TO-1 (capacity details listed under insignificant activity (1)), and emissions exhausted at Stack/Vent ID #S1;

2. one (1) enclosed can washer with recirculating solvent, with suspended VOC exhausted to and controlled by a thermal oxidizer, TO-1, then exhausted at Stack/Vent ID #S1;

3. one (1) curing oven and rollcoating paper coating application system, identified as CC-1, equipped with one (1) 1.35 million (MM) British thermal units (Btu) per hour, natural gas-fired burner for the curing oven, with a maximum throughput of 36 pounds of coating per hour to coat a maximum of 41.8 pounds of paper per hour, with VOC emissions controlled by an existing thermal oxidizer, identified as TO-1, exhausting through one (1) stack, identified as #S1;

4. one (1) curing oven and rollcoating paper coating application system, identified as S-4, with a maximum throughput of 425 pounds of coating per hour to coat a maximum of 1,079 pounds of paper per hour, with VOC emissions controlled by a new thermal oxidizer, identified as TO-2, exhausting through one (1) stack, identified as #TO-2; and

5. one (1) thermal oxidizer, identified as TO-2, using natural gas as a supplementary fuel at a maximum heat input rate of 3.0 million (MM) British thermal units (Btu) per hour, exhausting through one (1) stack, identified as #TO-2. The curing oven on the S-4 coating line is powered through heat recovery from this thermal oxidizer.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(1) one (1) paper coating operation, including lines S-1, S-3, and S-2, with a combined maximum throughput of 118 gallons of coating per hour, with emissions controlled by thermal oxidizer TO-1 (capacity details listed under insignificant activity (1)), and emissions exhausted at Stack/Vent ID #S1;
(2) one (1) enclosed can washer with recirculating solvent, with suspended VOC exhausted to and controlled by a thermal oxidizer, TO-1, then exhausted at Stack/Vent ID #S1; and
(3) one (1) curing oven and rollcoating paper coating application system, identified as CC-1, equipped with one (1) 1.35 million (MM) British thermal units (Btu) per hour, natural gas-fired burner for the curing oven, with a maximum throughput of 36 pounds of coating per hour to coat a maximum of 41.8 pounds of paper per hour, with VOC emissions controlled by an existing thermal oxidizer, identified as TO-1, exhausting through one (1) stack, identified as #S1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

(a) Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), no owner or operator of a coating line subject to this section may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of two and nine-tenths (2.9) pounds per gallon excluding water, delivered to the coating applicator from a paper, plastic, metal foil, or pressure sensitive tape/labels coating line.

(b) When operating the thermal oxidizer (TO-1) to achieve the limit for rule 326 IAC 8-2-5, 2.9 pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the thermal oxidizer shall maintain a minimum 94.0% overall efficiency. This efficiency is required by the rule 326 IAC 8-1-2 (a)(2). Based upon 326 IAC 8-1-2 (c) and the overall control efficiency of 94.0%, the VOC content of the coating shall not exceed 18.1 pounds per gallon of coating solids delivered to the applicator.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The usage of VOC, including coatings, dilution solvents, and cleaning solvents, in the rollcoating paper coating application system, identified as CC-1, shall be limited to 45 tons per twelve (12) consecutive month period, rolled on a monthly basis. VOC emissions from the rollcoating paper coating application system shall be controlled by the thermal oxidizer, identified as TO-1, that maintains a minimum overall control efficiency of 94.0%. This limit will render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.